

Loomis NRCA Management Plan SEPA Comments & Responses

April, 2003

On January 21, 2003, a Determination of Non-significance for the draft Loomis NRCA Management Plan was filed with the Department of Natural Resources' SEPA Center. The determination was followed by a public review of the proposal. The following comments were collected during the SEPA comment period, January 22, 2003 through February 28, 2003. The comments are categorized according to the chapters of the Loomis NRCA Management Plan.

INTRODUCTION

1. Page 2: Both FOLF and NWEA take exception to "The next step in the natural process is for fire to consume the dead and dying trees." While this might be true for some of the dead and dying lodgepole pine and spruce, certainly past fire patterns have shown that large areas are also spared from the spread of wild fire. With the suppression of fires for the NRCA, the sparing of trees from fire may be even more prevalent. [Skatrud]

Response: *Change recommended as follows:*

Fire rejuvenates the lodgepole forests and is most frequent in the dry summer months. Most of the precipitation occurs in the winter months as snow. Past natural fire events created thousands of acres of even-aged lodgepole forests including the forests within the NRCA. As a result, acres of trees aged at the same time and became host trees to native bark beetles. The natural accumulation of woody material combined with hot, dry, windy weather create conditions for another fire cycle. Heat from the high intensity fire release seeds for the next generation of lodgepole pine. next step in the natural process is for fire to consume the dead and dying trees, and release the seeds from lodgepole cones. However, Current law mandates the suppression of all uncontrolled fires thus interruption of the fire cycle may occur as a result of fire suppression.

2. Page 2: The "Lower" Similkameen Indian Band is the tribe just north of the Loomis NRCA and the border with Canada. It is the Lower Band and not the Upper Band that has given comment at previous public meetings. [Skatrud]

Response: *Change recommended as suggested.*

3. Page 6: While the DNR cannot differentiate between land designations within the greater Loomis Forest, the DNR should not cast the burden of managing for species of concern or late successional forest to the NRCA either. We expect the LF Plan to be followed, aspects of the Lynx management plan be spread across designations, and regulations adhered to. [Skatrud]

Response: *Habitat within the NRCA will be managed according to the Loomis NRCA Management Plan. The Loomis Landscape Plan is currently being updated and management alternatives for Late Successional Forest will be made available for public review and comment.*

No change recommended.

MANAGEMENT GOALS

4. Page 13 line 345: There should be no increase in environmental education activity in the winter time. If increased winter recreation activities are harmful to threatened and endangered species, then other activities will have the same negative effects. [Allard]

Response: Yes, wildlife are more vulnerable in the winter months. Habitat concerns will be taken into consideration when a site analysis is conducted to determine the site's capacity for outdoor environmental education.

No change recommended.

SITE CONDITION/DISCUSSION/MANAGEMENT ACTIONS

Physical Features and Conditions

5. Page 17: Please add Paymaster Creek to the list of creeks in the south block. [Skatrud]

Response: Change recommended as suggested.

Forest Zones and Plant Communities

6. Page 26: For management actions in the Quaking aspen stands the DNR should consider keeping cattle out of these stands. Cows do suppress aspen rejuvenation and promote the in-growth of conifers. [Skatrud]

Response: Aspen stands are included as limited habitats to be preserved in the Permit Range Management Plans for permit ranges that overlap with the NRCA. Limited Habitat Areas management is described under Ecosystem Standard B12. The management strategy is to (1) maintain or increase the acreage of limited habitats which approximate site potential and maintain or increase (in the case of snags) structural features which are important to wildlife and fish, and (2) encourage protection and restoration of limited areas and structured features. Management practices. Furthermore aspen stands are included in the monitoring section of the Loomis NRCA Management Plan and management practices will be reviewed at Coordinated Resource Meetings to identify appropriate actions to achieve Ecosystem Standard B12. Information from inventory and assessment efforts will be used to guide implementation of range management practices to meet HB1309 Ecosystem Standards.

The following changes are recommended:

Aspen Stands...

Management Actions

- *Inventory and map aspen stands and seral conditions.*
- *Maintain aspen component at its current approximate acreage or greater with a mix of seral conditions at landscape scale.*
- *Consider the use of prescribed fire or mechanical disturbance within aspen stands if necessary to maintain mixed seral conditions.*

- Work with Coordinated Resource Management group to implement range management practices to deter livestock from grazing in aspen stands.

Add aspen stands to the Sensitive Areas Section in the Management Guidelines Chapter.

Aspen Stands – Aspen form colonies as new shoots sprout from a common system of roots. Conditions, such as overgrazing and fire suppression, may suppress aspen rejuvenation leading to an overall decline in aspen stands. Furthermore, aspen tend to grow in moist areas and the roots are vulnerable to compaction.

7. Page 26, maintaining the aspen component may not be possible in the case of a satin moth attack. [Coppet]

Response: Change recommended as follows:

Quaking Aspen Forest

Discussion

The condition of aspen stands with regard to stand maturity and composition of understory vegetation has not been assessed. Many stands are near seeps or other areas with high water tables that have moist soils and relatively lush vegetation late into the season. As a result, cattle grazing is concentrated in some aspen stands and likely suppresses aspen rejuvenation. Furthermore fire suppression activities also interfere with the natural rejuvenation process. Reintroduction of fire, or perhaps mechanical disturbance, may be necessary to maintain the extent of aspen stands and the mix of seral stages that are important for wildlife.

Larvae of the satin moth (*Leucoma salicis*), an insect introduced into North America from Europe, attack various tree species in the genus *Populus*, including quaking aspen and black cottonwood. The caterpillars feed on the foliage of these species and can completely defoliate trees. Extensive and repeated defoliation can result in suppressed growth, top-kill, or tree mortality. Large infestations can kill significant portions of aspen or cottonwood stands.

Signs of this insect have not been observed in the Loomis NRCA, however it is known to occur in much of southern British Columbia as well as in portions of Washington State, including Okanogan County. Significant infestations have occurred in this area in recent years, resulting in mortality of entire aspen clones in some cases. Alternatives for control of satin moth currently include application of insecticide to the canopies of infected stands or introduction of biological control agents (parasitic wasps and flies).

Management Actions

- Inventory and map aspen stands and seral conditions.
- Maintain aspen component at its current approximate acreage or greater with a mix of seral conditions at landscape scale.
- Consider the use of prescribed fire or mechanical disturbance within aspen stands if necessary to maintain mixed seral conditions.
- If evidence of insect or disease activity such as satin moth is observed, consult with DNR Forest Health staff to determine the degree of threat posed and appropriate actions.

Guidelines: Insects and Disease (pg55)

The site will be monitored for the presence of bark beetles, satin moth, white pine blister rust and other insect and disease activity during routine site visits. If monitoring indicates substantial activity of the insects or pathogens described above, an entomologist or forest pathologist should be consulted regarding the severity of the activity and possible solutions.

8. Page 28: Please add Timothy Ridge to the shrub-steppe areas that are heavily impacted by cattle grazing. [Skatrud]

Response: Although areas like cattle trails may have been heavily impacted the Timothy Ridge as a whole the area is not heavily impacted. The comment will be passed to the CRM group to address your concerns.

No change recommended.

9. Page 29: "Work with permit holders to achieve Ecosystem Standards" is not strict enough for protecting the natural features on the Loomis NRCA. The cattle permit holders must keep their cattle from destroying the natural features and processes on the NRCA. [Skatrud]

Response: HB 1309 Ecosystem Standards are the highest standards for range management on state land. Failure to comply with Resource Management Plans (they include HB 1309 standards) may result in default under subsections 4.05, 4.06 and 5.05 of the associated grazing permit or permits.

No change recommended.

Plant Species

10. Page 35 Management Actions, too many studies and documentation about noxious weeds, not enough physical actions to get rid of them. [Plum]

Response: General observations indicate few, if any, significant populations of weeds within the Loomis NRCA. In order to maintain this low level of weed populations, areas with a high potential for weeds (e.g. harvested and burned areas, roads and trails) will be periodically inspected. Small populations may be removed at the time of inspection, larger populations may require a control plan for effective control and removal.

Change recommended as follows:

Management Actions

- *Conduct periodic inspections of disturbed areas (e.g. harvested and burned areas, roads and trails) with high potential for weed invasion,*
- *Map and document As occurrences of noxious weeds ~~are encountered, they should be mapped, documented, and a control plan developed.~~*
- *~~Weed control plans, when developed~~ Develop and implement weed control plans, will that use an integrated pest management approach and focus on minimizing impacts of the control methods while effectively controlling target weeds.*

Wildlife Habitat

11. There is too much documentation of animals. [Plum]
12. Why are so many wildlife species covered in the plan when they clearly are not present within the NRCA? [Peterson]

Response for comments #11 & #12:

The conservation purpose of NRCAs includes maintaining habitat for threatened, endangered, and sensitive species (plants and wildlife). The Memorandum of Clarification, signed in December 1998, provides additional parameters to be included in the development of the Loomis NRCA Management Plan. The Memorandum of Clarification states that the primary purpose for designating the NRCA was to maintain the land in the most natural condition possible to provide habitat for native wildlife, including wildlife requiring roadless areas.

The list of wildlife species in the draft Loomis NRCA Management Plan were included because they are identified as federal or state listed species, or are known to be critically imperiled, vulnerable or very rare.

Even though a species may not inhabit the NRCA, the habitat is maintained in the event a species needs it.

No change recommended.

13. Page 36: The Pacific fisher should be listed in the priority species list. This species is listed as endangered by the state and is a candidate for listing under the federal Endangered Species Act. [Skatrud]

Response: *The Loomis NRCA Management Plan includes descriptions of habitat for listed wildlife species known to inhabit or likely to inhabit the Loomis NRCA. The fisher is not likely to inhabit the Loomis NRCA according to information gathered by WA Department of Fish and Wildlife.*

The fisher is thought to be extirpated from the state of Washington (K. Aubry pers. comm.). Consequently, Washington Department of Fish and Wildlife is currently attempting to identify locations for fisher reintroduction. To identify suitable reintroduction locations, Washington Department of Fish and Wildlife is developing a Habitat Suitability Assessment for the fisher (Jeff Lewis pers. comm. March 12, 2003). The criteria that they are using to determine habitat suitability for the fisher are: (1) 40% of the area needs to be vegetated, (2) 30% of the area needs to be vegetated with conifers, (3) Conifer trees must average 20" or greater, and (4) elevations below 5,000'. These criteria are based on what is known about fisher habitat requirements.

Nearly the entire area of the Loomis NRCA is above 5,000' and average tree diameters within many of the forested stands are too small. Historical records of fisher inhabiting the region are scarce and there are no museum records. Taken together, this information suggests that it is not likely that the Loomis NRCA would be selected as a suitable reintroduction location for fisher.

No change recommended.

14. Page 37 & 38, no documentation of what grizzly bear eat. Lines 113 and 116, is there a remnant population or no population of grizzlies? Grizzlies should not be reintroduced because they weren't here in the first place. [Plum]

Response: A description of grizzly bear habitat is provided on page 38 of the plan..." All naturally vegetated land types are considered suitable grizzly bear habitat as it (the grizzly bear species) ranges over large areas and typically uses many vegetation types to fulfill its life requirements. Habitats of special importance include: wet meadows, swamps, bogs, streams, alpine meadows and parklands, and conifer, sub-alpine, and lodgepole pine forests. Grizzly bear "core Habitat" is that which is greater than a third of a mile from roads and high use trails (average of 20 or more parties)." The Loomis NRCA has grizzly bear habitat and is part of the federal grizzly bear recovery plan.

A remnant population of grizzly are associated with the North Cascades Grizzly Bear Ecosystem of which the Loomis NRCA is a very small part. Within the Loomis NRCA itself, no grizzly bear are known to exist.

Grizzly bear recovery actions are managed by federal and state fish and wildlife agencies. Thus, the Loomis NRCA Management Plan does not provide specific management actions for reintroduction of wildlife species. The intent of NRCA management is to not inhibit species recovery.

No change recommended.

15. Page 39: Gray Wolf: Change the paragraph [management action] as it is currently written to read as follows: Trails may need to be temporarily closed from May 1st through June 15th to avoid disturbance to denning or rendezvous sites located immediately adjacent to trails. [Nelson]
16. On page 39 lines 127 and 128 should be deleted and replaced with "coordinate with U.S Fish and Wildlife Service and Washington Dept. of Fish and Wildlife to adapt management actions as additional research is provided". [Barnes]

Response: Change recommended as follows:

Management Actions

- ~~*Trails may need to be temporarily closed or moved to avoid disturbance to a den or rendezvous site—especially those that are located near water and meadows.*~~ *Coordinate with Fish and Wildlife Service, and Washington Department of Fish and Wildlife to determine trail closure dates, locations and other potential management actions.*

17. Page 39: Wolverine: Change the paragraph [management action] as it is currently written to read as follows: Trails may need to be temporarily closed from May 1st through June 15th to avoid disturbance to den sites located immediately adjacent to trails. Consider relocating trails that are immediately adjacent to wolverine den(s) that are used as birthing sites for (at least) three consecutive years. [Nelson]
18. On page 39 line 157 and 158 should be deleted and replaced with "coordinate with U.S fish and wildlife service and Washington dept. of fish and wildlife to adapt management actions as additional research is provided". [Barnes]

Response for Comments #17 & #18:

Change Recommended as follows:

Management Action

- ~~*Trails may need to be temporarily closed or moved to avoid disturbance to a den or rendezvous site.*~~ *Coordinate with U.S. Fish and Wildlife Service, and Washington Department of Fish and Wildlife to determine trail closure dates, locations and other potential management actions.*

19. Page 42: Turkeys have been sighted in the Loomis NRCA. This bird is a non-native species and has not been assessed by WDFW for impacts to native species. This bird needs a control plan on the Loomis NRCA until a full assessment has been done on the impacts to other native birds, reptiles and amphibians, plants, and mollusks. [Skatrud]

Response: DNR does not have jurisdiction over the control of wildlife species. As stated in the Management Actions for Non-native and Introduced Animals, as non-native wildlife species are discovered, sightings and disturbance to the sight should be documented and if necessary, work with the WA Department of Fish and Wildlife to develop a control plan.

Change Recommended to acknowledge sighting of turkeys as follows:

Non-Native Animals

Other than livestock, non-native turkeys are the only non-native animals no sightings or issues have been reported sighted in the Loomis NRCA. Impacts from the presence of turkeys have not been documented. regarding non-native or introduced animals.

Management Actions

- *Conduct periodic inspections of the site for non-native wildlife species.*
- *As non-native wildlife species are discovered, sightings and disturbance to the site should be documented, and if necessary work with the Department of Fish and Wildlife to develop a control plan.*

Land Use

Incompatible Uses

20. On page 44, lines 306, competitive events and removal or alteration of vegetation are listed as incompatible uses. Not all competitive events should be banned. Orienteering, endurance riding, and dog sled racing would have no more adverse effect than any other recreational activity. Therefore there should not be a blanket ban of competitive events. [EM3-C1a Kelly & Barnes]
21. Pg 44 Line 306 excludes "competitive events". Not all competitive events should be excluded. What about endurance riding, dog sledding, or orienteering. None of these events would have a negative effect on the NRCA. [Kelly]

Response for comments #20 & 21:

Change Incompatible Uses section by deleting competitive events. Competitive events on DNR land require a permit. Events proposed for the NRCA will be reviewed on a case-by-case basis using the criteria outlined in the management plan under Conditional Use.

Change recommended as follows:

Incompatible Uses

Some types of use are not compatible with the goals of the Loomis NRCA. When done frequently or by enough visitors, these activities prevent DNR from successfully fulfilling its land management responsibilities outlined in the NRCA Act and the Settlement

Agreement. Incompatible uses include any activities that DNR determines to be unsafe, destructive, disruptive or in conflict with the management goals of this plan. They include, but are not limited to:

- *Recreation with wheeled (motorized/non-motorized, e.g. mountain bikes) vehicles,*
- ~~*Competitive events*~~
- *Removal or alteration of vegetation, soil, or rock, except as part of weed control, habitat restoration projects or tribal use.*

22. Page 44: Removal or alteration of vegetation is also listed as an incompatible use. This was to be directed at human beings but as stated it could be used to ban grazing of livestock. Line 308 should have permitted livestock grazing management added as an exception. [Kelly & Barnes]

Response: Change recommended as follows:

Incompatible Uses

Some types of use are not compatible with the goals of the Loomis NRCA. When done frequently or by enough visitors, these activities prevent DNR from successfully fulfilling its land management responsibilities outlined in the NRCA Act and the Settlement Agreement. Incompatible uses include any activities that DNR determines to be unsafe, destructive, disruptive or in conflict with the management goals of this plan. They include, but are not limited to:

- *Recreation with wheeled (motorized/non-motorized, e.g. mountain bikes) vehicles,*
- *Competitive events*
- *Removal or alteration of vegetation, soil, or rock, except as part of weed control, permitted livestock grazing, habitat restoration projects or tribal use.*

23. Page 44, line 331 insert after site management ", Permitted grazing management". [Kelly & Barnes]

Response: Change recommended as follows:

Access

North Block

Access to the NRCA is limited to foot, horseback, and non-wheeled motorized vehicles. Wheeled vehicle access is limited to site management (including permit range management) and emergency vehicles. Visitors can reach the boundary of the north block by traveling on DNR roads (Figure 7, Trails and Roads). The Ninemile Road ends at the Loomis NRCA boundary north of Cold Creek...

24. Page 46 Figure 7- Trails and Roads- North Block. The map does not show the "Goodenough Trail" which is a major stock driveway and main equestrian route from Snowshoe Cabin into the Pasayten Wilderness. This trail is also a popular snowshoe trail and the lower portion of it is a main snowmobile route from the Snowshoe Trail into the Snowshoe Cabin. The portion of this trail which is shown on the map (the lower portion) is identified as winter use only. Also, the map does not show the all season trail looping from the Snowshoe trail into the Snowshoe Cabin. [Windsor]

Response: *The discrepancy is noted and suggested changes recommended.*

25. Page 46-47: Regarding recreation, please refer to our maps that accompany these comments. [Skatrud]

Response: *The trails in question were identified and agreed upon by representatives from Friends of the Loomis Forest, Butte Buster Snowmobile Club and Okanogan County Backcountry Horseman Association. Some discrepancies between trail locations still exist (less than 3% of the trails in the Loomis Forest). The trail map shows a representation of the trail locations and additional ground-truthing is needed to record accurate locations of the trails.*

No change Recommended.

26. Page 43 (& 47). States that the only ATV authorized use on the south block is on the Thunder Mountain Road and Lone Frank road. The Bottle Spring Trail has been a multiple use trail (i.e.- livestock, equestrian, hiker, snowshoe, snowmobile and ATV) for more than 20 years. There is no need or justification for changing the status of this trail now. [Windsor]
27. Pg 47: The Bottle Springs Trail is and has been an ORV trail for over 20 years. It starts on USFS land as a motorized wheeled vehicle trail. This is the only ORV trail of importance in the Loomis NRCA. [Allard]

Response to comments #26 & #27: *The 1996 Loomis Landscape Plan shows the Bottle Springs Trail closed to wheeled motorized vehicle use. Thus wheeled motorized vehicle use will continue to be prohibited on the Bottle Springs Trail. The trail will remain open to snowmobiles and other uses identified in the Loomis NRCA Management Plan.*

No Change Recommended.

Recreation/Trails

Snowmobiles

28. Page 48, line 397 and 398: New snowmobiles come from the factory with lower gear ratios than in 1985, 16 miles an hour to be exact. New snowmobiles are not faster than older machines of like horse power and size. The difference in accessibility is that the new machines allow us to go places earlier in the season than in the past. Normally in late Feb. any snowmobile can go anywhere because of firm snow conditions. Snowmobile operating range has not changed in the last 20 years. A 1988 400 Polaris SKS can go just as far on a tank of gas as a 2003 600 RMK can. Line 396 should read in the late 1980s. That was the first real change. [Allard]

Response: *Change Recommended to read as follows:*

Snowmobile ~~trails-use~~ in the Loomis NRCA are un-groomed, discovery trails and receive a low level of use compared to other snowmobile trails in the Loomis State Forest. In general, trails in the Loomis NRCA are narrow with tight turns, cover difficult terrain through dense forest and are

~~not conducive to high speeds. Management actions, including trail maintenance, should maintain these trail characteristics. is a back country experience that requires technical riding at low speeds through difficult terrain and heavily forested areas. In the late 1990s snowmobile technology created more powerful machines. As a result historic use occurs but with new machines that are capable of traveling greater distances and speeds to areas that were either lightly used or inaccessible in the past. This issue has been discussed by winter user groups out of a concern for safety, habitat for critical species, user experience, scenic qualities and trail maintenance.~~

The U.S. Fish and Wildlife Service requested that DNR not allow any increase in designated or groomed over-the-snow snowmobile routes or snowmobile play areas within Lynx Management Units (this includes both blocks of the NRCA). Authorized trail routes and play areas are shown on figures 7 and 8. DNR intends to manage snowmobile use and will employ strategies to discourage inappropriate use.

29. Page 49: Trails need to be marked with assurance markers. We suggest that the orange diamonds used by WA St. Parks to mark snowmobile trails on public and private lands in WA State be used. That way all trails be marked the same and these orange diamonds are visible at night. We don't need people getting lost or stranded. They should be attached to trees with aluminum nails. [Allard]

Response: *Change Recommended. See comment #39.*

30. Page 49, 60 65: The draft plan allows for keeping vegetation trimmed back on the portion of the 14 Mile Road used for emergency vehicles. The plan should state how far the vegetation would be trimmed back from the centerline of the existing road and how far the road will be maintained into the NRCA. [Skatrud]

Response: *Clearing the road wide enough for maintenance equipment is important so as not to have costly damage to the equipment or hazards to the operators. Depending on the vegetation the clearing width can vary from 12 feet to 16 feet. We intentionally did not place a clearing width because of the many variables, but do not intend to maintain the road any wider then what is required. This is usually the most cost effective choice. We are also subject to forest practice rules, and if they should require clearing work for drainage structures this number could cause another area of misunderstanding.*

No Change Recommended

31. Page 50, line 501 insert ", allow wheeled vehicle access to facilitate permit range management". [Kelly & Barnes]

Response: *Change Recommended to reflect comment in Table 3 Allowed uses within the Loomis NRCA.*

Wheeled Motorized Vehicles	Prohibited in all areas except for Use is only permitted on Thunder Mountain Road and Lone Frank Road. <u>Additional exceptions include agency use, fire suppression, permit range management or written permission from DNR.</u>
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MANAGEMENT GUIDELINES

Fire

32. Page 55, should continue to protect those trust lands from fire to make money. [Plum]

Response: All uncontrolled fires in the NRCA will be suppressed. The Loomis NRCA is subject to RCW 76.04.750 which states that "every reasonable effort will be made to suppress uncontrolled fires."

No Change Recommended.

33. Page 55: Regarding an appropriate time to restrict grazing after a burn, the department should state an initial time period with no grazing after a fire. To leave designating a restriction time from grazing until the Coordinated Resource Management meetings is not a favorable way to handle a delicate land consideration. We do not trust a closed decision making process with no SEPA review. The DNR has a long history of bowing to the interests of permittees rather than doing the right thing for the land and the trust. [Skatrud]

Response: Natural Areas staff will be developing and coordinating restoration activities following a fire as needed. A successful restoration plan will depend on collaboration with permit holders and user groups. Region Natural Areas staff are available to meet with anyone interested in the development of restoration plans. Coordinated Resource Management Meetings happen to be the forum used to communicate with permit holders.

Change recommended as follows:

Wildfire Rehabilitation

Following a wildfire, the burned area should be allowed to regenerate without human intervention. Specific restoration activities may be needed to restore areas disturbed by fire suppression activities. Post-fire revegetation will not be undertaken unless natural revegetation is impeded or slowed to such an extent that the ecological features or processes in the area will be negatively impacted. Restoration efforts will be designed based on consultation with Natural Areas Ecologists. Burned areas may need protection from livestock until a restoration plan is in place. ~~will be reviewed at Coordinated Resource Management Meetings to determine an appropriate length of time to restrict grazing and allow vegetation to recover.~~

34. Page 55, Line 591, the trust lands should be regenerated after fire by the DNR, not naturally. [Plum]

Response: The Loomis NRCA is not trust land and is not managed to generate revenue. NRCA statewide policy states that sites shall be left in a "natural setting" including results from natural events whenever possible. Restoration may also be used after a naturally occurring event if it is necessary to prevent significant environmental damage or maintain natural systems.

No Change Recommended.

35. Page 55, erosion control should be a factor in regeneration after fires. [Coppet]

Response: Erosion control is covered under the Wildfire Suppression Plan for the Loomis NRCA located in Appendix E of the Loomis NRCA Management Plan. Seeding and, erosion and weed control will be coordinated with a Natural Areas Advisor and/or the Natural Areas Eastside Ecologist.

No Change Recommended.

Insects and Disease

36. Page 56: We would like to see language in the plan that any upcoming insect control plans will go through SEPA for public review. [Skatrud]

Response: It is standard practice within DNR to conduct a SEPA environmental review for aerial spray activities such as insect control. As for other insect control activities, Natural Areas Program staff is aware of the high level of interest in the management of the Loomis NRCA and will continue to incorporate public participation during implementation of management activities.

No Change Recommended.

Public Use

Backcountry Experience

37. Page 57: In recreation, the term “no trace” is an unattainable goal, should be “minimum impact”. [Barnes]

Response: Change recommended as follows:

Backcountry Experience –The Loomis NRCA provides a backcountry (no improvements or facilities other than trails) type of hiking and camping experience however it is not classified as a wilderness area. ~~No trace~~Minimum impact camping methods are required to maintain the rustic nature of the site. Whatever is packed in must be packed out. Stewardship of the natural resources is an important part of using the NRCA and is appreciated by all users.

Trail Etiquette

38. Page 57: Insert the following sentence after the first sentence (line 672) in the paragraph: “Hikers and dismounted riders should step off of the trail on the downhill side of the trail to allow mounted riders and animals to safely pass.” [Nelson]

Response: Change recommended as follows:

Trail Etiquette – When encountering users on horseback, approach them slowly and with caution. Pedestrians should step aside to allow mounted riders and animals to pass by. A startled horse may cause the rider to lose control, be bucked off or cause injury. If the ~~wildlife~~animal should break free, the rider may have to pursue the ~~wildlife~~animal for some time and distance before gaining control again.

Blazing

39. Page 58, line 697 delete " , so this method of trail marking needs to be authorized in advance in writing from DNR." [Kelly & Barnes]

Response: Change recommended as follows:

Blazing – Blaze marks are located on two sides of a tree and are made by removing a patch of bark leaving a scar that is fairly uniform in appearance. These marks are usually visible from one to the other and denote the location of the trail. ~~Blazes exist for many years and can damage a tree if done improperly; so this method of trail marking needs to be authorized in advance in writing from DNR.~~ Less severe methods such as a dot of paint or orange metal diamond markers (in response to comment # 29) could also be used to mark trails. ~~of marking trails are used when the trail location is subject to change such as a dot of paint.~~ These marks need to be placed high enough so that the snow pack will not cover them in the winter. An inventory and site plan for marking trails and installing signs is a high priority. Trails will be marked by DNR staff or volunteers with written approval from NE Region or Natural Areas Staff.

Trail Standards

40. Page 58: Type – A (line 706): Change *Maximum Width* (line 707) to *Maximum Clearing Width*. Add specification Maximum Clearing Height: 10 feet between lines 707 and 708. Type – S (line 721): Change *Maximum Width* (line 722) to *Maximum Clearing Width*. Add specification Maximum Clearing Height: 10 feet between lines 722 and 723. [Nelson]

Response: Changes Recommended as follows:

Trail Standards - The following three trail types will be used to delineate trails in the Loomis NRCA. See figures 7 and 8.

Type – A – All Authorized Use Trail, All Season

Maximum Clearing Width: 8 feet (except roads 12 feet)

Maximum Clearing Height 10 feet

Marking Guidelines: Signage and Blazes

Structure Standards: Water Crossing, Trail Drainage and Hardening,
Signage, Mileage Markers, Blazes

Users: Cattle, Horses, Hikers, Snowmobiles

Type – S – Summer Use Only Trail

Maximum Clearing Width: varies 3-8 feet

Maximum Clearing Height 10 feet

Marking Guidelines: Signage and Clear Path Blazing

Structure Standards: Water Crossing, Trail Drainage and Hardening

Users: Cattle, Horses, Hikers

41. Page 59 lines 737 and 746. 2002 and 2003 model year snowmobiles are 46 inches wide. Cutting a trail 46 inches wide is not acceptable. Also with those standards a tree could fall across the trail in an area that is say 6 feet wide and now the DNR wants the width narrowed to 46 inches. With the present thinking by the DNR these trails will become narrower than they presently are. The rescue sleds used by Okanogan County Search and Rescue will not operate on 46 inch trails. [Allard]

42. Page 59 line 737. "Approximately 46 inches" should be changed to approximately 60 inches as a minimum. There is no way a 46 inch wide snowmobile can maneuver on a trail only 46 inches wide. [Windsor]
43. Disabled riders should not have restrictions on where they can ride. A trail clearing width of 46" causes snowmobiles to get stuck. A 60" clearing width is needed for snowmobiles. Only skilled riders can travel a 46" wide trail. Novice riders should be able to ride the Loomis trail too. [Coppet]
44. As an active EMT and a snowmobiler I find the proposed 46" width rule for winter use only trails completely unworkable. If a snowmobiler, shoeshoer, or DNR employee would have to be transported on one of the two Winter use only trails by rescue sled, 60 inches of trail width is the minimum that would be needed. I will be sharing this information with the OCSO. P.S. The trails are now wider than 46 inches! [Miller]

Response to Comments # 41-44: This narrow width is an approximation based on field observations. This standard applies to a small number of the trails and a small percentage of the total linear distance of trails (less than 3 % of the total miles of snowmobile trails) in the Loomis State Forest when viewed as a whole. The main objective of this narrow trail width is to maintain the backcountry, discovery trail character. Areas that have been historically wider will be approved to wider trail clearance on a case by case basis in writing as part of the operational management of the site.

No Change Recommended

45. Page 59 line 740 . We see snowshoe tracks on these trails in the winter. [Allard]

Response: Change recommended as follows:

Type – W – Winter Use Only

Maximum Width: Approximately 46 inches

Marking Guidelines: Blazing

Structure Standards: No Structures, No Trail Signs

Users: Snowmobiles, Snowshoe Hikers and Cross-country Skiers

46. Page 59: Please add the word "ATV" after the word cattle on line 748. Placement of down woody material on winter use trails is also to discourage illegal ATV use. [Skatrud]

Response: Change Recommended as follows: At least 12-18 inches of down woody debris will be retained for the first 100-150 feet to discourage cattle, ATV users and foot traffic outside of the winter months.

Research

47. Page 59, line 752 through line 761: We request the following sentence added: "All agencies and groups who have done research or monitoring in these areas, such as Soil County Conservation Districts, etc., are to be grand-fathered in and allowed to continue their research. [Dezellum & Peterson]

Response: Change recommended as follows:

New Research activities within the NRCA must be pre-approved by the Natural Areas Ecologist. Existing research projects will continue and will be reviewed annually by Natural Areas Program staff. Research projects will be encouraged among potential researcher groups, such as colleges, universities, and relevant research laboratories. Sources of funding for specific research topics will be sought and applied for, as applicable. Potential partners for research projects and/or funding will also be sought.

Forestry Activities

48. Page 59: Regarding forestry activities in the Loomis NRCA, we want any activity to go through a SEPA process in order that the public will be able to give comment. [Skatrud]

Response:

It is likely that forestry related activities regardless of the intent to restore an ecological system, will be subject to a SEPA threshold determination. Natural Areas Program staff is aware of the high level of interest in the management of the Loomis NRCA and will continue to incorporate public participation during implementation of management activities.

No change recommended.

49. What is the Natural Areas Stewardship Management account? [Peterson]

Response: *The legislature created the account and it is used specifically for special lands (NRCAs and NAPs). Details are in RCW 79.71, the NRCA Act. The primary source of funds for this account have come from legislative appropriations.*

No change recommended.

50. Money generated from the NRCA should go to the trust. [Peterson]

51. Page 59 lines 770-772, line 770 should be changed to read: "Any income that would be generated from Forestry Activities will be deposited in the School Trust." [Dezellum & Peterson]

52. It was stated that income generated by forest practices for ecological maintenance, restoration or enhancement would be incidental to the forestry practice and funds would be deposited in the Natural Areas Stewardship Account. We oppose any forest practices funds to be used for any purpose other than school trust funds. [Kretz]

53. DNR should do its best to manage the forest to make money, its first priority, regardless of environmental laws. [Plum]

Response: *The NRCA was purchased from the trust and is no longer trust land, thus it is not managed to produce revenue for the trust. At the time of the transfer of land from trust to NRCA status, the trust was compensated in two ways. First, the appraised value of the standing timber (\$13.3 million) was deposited into the Common School Construction account. Second, the appraised land value (\$3.2 million) was deposited into the Real Property Replacement Account to be used for replacement assets for the common school beneficiaries.*

No change recommended.

IMPLEMENTATION

54. Page 65 Land use: We agree in theory with items under the heading of Land Use. Access, Recreation/ Trails, Permit (grazing) Range Management.

We do not feel that a state that is running 2.6 billion dollars in the red should be spending public funds to study plants that have survived 150 years of sheep and cattle grazing. The funds to finance these type of activities should come from private sources. If the DNR is going to lock the public out of an area (Chopaka Natural Area Preserve) then public funds should not be used to create a play ground for a privileged few and jobs should not be created and financed with public funds to study such areas. [Allard]

Response: Plant species monitoring in the Loomis NRCA includes tracking one species, the two-spiked moonwort. Monitoring is done to maintain up-to-date information on location and population size recorded in the state database for rare plants. Populations of state sensitive species will be visually monitored every three years. Natural Resources Conservation Areas (NCRAs) and Natural Area Preserves (NAPs) fulfill the intent of Washington law whereby parcels of public land are managed specifically for conservation and environmental education.

No change recommended.

GENERAL COMMENTS

Cattle Grazing

55. Grazing: FOLF and NWEA are especially concerned with the impacts of grazing on the Loomis NRCA. The history has been dismal at best. Snowshoe Meadows smells and looks like a feedlot by September. The open shrub steppe lands are grazed too far down. Streams are trashed by hooves and cattle manure. There is absolutely no public involvement in the Coordinated Resource Management plans for grazing in the whole Loomis Forest. The DNR is still trying to enact the Ecosystem Standards for Grazing on State Lands, a document approved in 1994. The DNR must stand up to the permittees on the Loomis NRCA to protect the natural features and processes from the detrimental effects of grazing. [Skatrud]

Response: Livestock grazing is a permitted use in the Loomis NRCA as stated in the Settlement Agreement, thus associated impacts are expected. Currently, HB 1309 Ecosystem Standards are the highest standards for livestock grazing and DNR continues to work with range permit holders to achieve those standards. The goals and objectives of the NRCA are incorporated into the permit range management plans and Natural Areas staff will be included in the Coordinated Resource Management Meetings to voice their concerns about meeting the goals and objectives of the Loomis NRCA Plan.

No Change Recommended.

56. Related to grazing is the lack of public involvement in "Coordinated Resource Management Team" plans/planning. I think things should be done with the 'doors' open in these matters. [Belzer]

Response: As public land managers, DNR Natural Areas staff value input from all interested parties and are available to meet with user groups to discuss land management activities. The Coordinated Resource Management planning process is one that is voluntary to the stock growers and is sponsored and coordinated by the individual county Conservation District in conjunction with the Natural Resource Conservation Service. Coordinated Resource Management meetings provide an existing forum for Natural Areas staff to communicate with permit holders. Similarly, Natural Areas staff may attend regular scheduled meetings organized by other special interest groups to discuss land management issues. Coordinated Resource Management meetings are not DNR meetings, rather DNR is a participant at the meetings.

No Change Recommended.

57. I did not see enough guarantees that over-grazing would not occur; and grazing in especially sensitive areas would not occur, such as in wetlands and riparian areas, and also in aspen groves. [Belzer]

Response: Livestock grazing practices are reviewed every year at the end of the season (in the fall) to evaluate their effectiveness. Adjustments and improvements will then be implemented the following season. Aspen stands and sensitive areas (see Management Guidelines Chapter) are high priority area for assessing and minimizing adverse impacts. See Comment #6 for more detail regarding range management and aspen stands.

No change recommended.

58. Wetlands and Streams: These areas are vital to the health of the Loomis NRCA, as they are utilized by wildlife and harbor sensitive plants. Wetlands, wet meadows, and streams should not be sacrificial lambs to the cattle industry. Either the permittees should demonstrate that grazing is compatible to NRCAs or they should be removed. Let the DNR and cattle permittees show us a model program that does not compromise NRCA standards. [Skatrud]

Response: As stated in the management goals for the Loomis NRCA, management actions will strive to coordinate the conservation of natural ecological values with outdoor environmental education, low-impact public use, snowmobile use, equestrian activities and livestock grazing. Sensitive areas are the priority areas for monitoring and implementing management practices to meet HB1309 Ecosystem Standards.

No Change Recommended.

59. HB 1309 Ecosystem Standards (part of the Resource Management Plans for permit ranges) must be used as guides for the action plans we are using in working toward goals and not as an excuse to discontinue grazing. While implementing 1309 standards, the entire picture must be considered, not just focusing on one small area. Hot spots will happen, some may lend themselves to improvement, some may not. [Barnes]

Response: The relationship between the NRCA and permit ranges is explained in the Introduction of the Management Plan where it is stated, "...the Resources Management Plans will serve as the primary management document for grazing activity in the Loomis NRCA."

Permit range management will be evaluated based on goals and objectives outlined in Resources Management Plans for each permit range.

No change recommended.

60. Something to remember: the permit ranges didn't move on to NRCA land. The NRCA moved on to the historic ranges in the Loomis area. The former federal grazing allotments have had to adapt to new land lords over the years. This has become increasingly difficult over the years, but if all partners will live up to the spirit of the agreement that created the NRCA land, we can continue successfully operate the permit range program. It is disheartening to see some of the involved parties circumventing the process by trying to eliminate the permit ranges just as the planning process nears completion.. [Barnes]

Response: *Grazing is acknowledged throughout the management plan as a permitted use. Management actions are designed to accommodate livestock grazing while minimizing the associated impacts as much as possible.*

No change recommended.

61. We have been researching and monitoring plans for grizzly recovery and are strongly opposed to grizzly augmentation. We will continue to monitor the Loomis planning processes to ensure grizzly augmentation does not become part of the plan. [Kretz]

Response: *A remnant population of grizzly are associated with the North Cascades Grizzly Bear Ecosystem of which the Loomis NRCA is a very small part. Within the Loomis NRCA itself, no grizzly bear are known to exist.*

Grizzly bear recovery actions are managed by federal and state fish and wildlife agencies. Thus, the Loomis NRCA Management Plan does not provide specific management actions for reintroduction of wildlife species. The intent of NRCA management is to not inhibit species recovery.

No Change Recommended.

62. It is becoming more obvious as time goes along that the Grizzly Bear, Wolf and Lynx are tools being used via the ESA to prevent, reduce or restrict multiple use of public lands. The DNR is bound by law to do certain things, like protecting habitat, but this needs to be kept in perspective and not become a situation of the tail wagging the dog. The Grizzly bear must not be used as an excuse to eliminate the multiple use aspects of this plan. Grazing and recreation have a vested interest in the area covered by the NRCA. It is questionable if the Grizzly were ever significant in this area and allowing them to supersede other uses is unacceptable. [Barnes]

Response: *One of the goals of the NRCA is to protect habitat for threatened, endangered and sensitive wildlife. While grizzly bear and wolf do not inhabit the site, management actions are designed to maintain their habitat. At this point in time changes to the current uses are not required. To date, the only restriction on recreation is associated with Canada lynx where the U.S. Fish and Wildlife Service requested that there not be any increase in designated or groomed snowmobile routes or snowmobile play areas within Lynx Management Units.*

No change recommended.

Recreation

63. Snowmobiling (30 years) and grazing (150 years) are historic uses on the Loomis Forest. If a threatened or endangered species were to move into these areas of historic use and den or take up residency, it would be assumed that these activities don't disturb these mammals or they would not have migrated into these areas of use. No restrictions on existing activities should be added. [Allard]

Response: One of the goals for the Loomis NRCA is to protect habitat for threatened, endangered and sensitive wildlife species. Regardless of the circumstances by which a listed species chooses to inhabit the Loomis NRCA, management actions will be implemented to minimize threats and adverse impacts to the species while maintaining the public use opportunities listed in the management plan.

No Change Recommended.

64. Snowmobile, cross country ski or snowshoe tracks that are made into Lynx habitat are not a threat to Lynx populations. Competing predators by your own statements cannot travel in the deep snow in Lynx habitat which means they would not be able to leave the track and travel cross country in search of food or be able to catch a Lynx and kill them. The only choice these predators will have is to retreat by the method they came into Lynx habitat on or die. [Allard]

Response: Text related to this comment was deleted from an earlier draft of the management plan in response to a similar comment received during public review of the preliminary draft plan. Management Actions for Canada lynx habitat reflect collaborative and adaptive management approach:

- *Coordinate with U.S. Fish and Wildlife Service and WA Department of Fish and Wildlife to meet Canada lynx habitat protection goals and objectives outlined in the DNR Modified Lynx Habitat Plan.*
- *Adapt management actions as additional research is provided.*

No change recommended.

65. Recreation: The history of snowmobiling in the Loomis Forest is not necessarily what the Okanogan County Snowmobile Board claims it is. This board has taken it upon themselves to groom roads in the last 2 years that haven't been groomed before, including one road in the Loomis NRCA. We want the DNR to commit to keeping the system honest by ensuring that the traditional snowmobile areas are open and not expanded into new areas or areas that haven't been snowmobiled for decades. There are snowmobilers who care little for open and closed areas, knowing full well there is no enforcement. [Skatrud]

We have enclosed copies of the recreation trail maps to show the discrepancies in snowmobile trails that are no longer used and those indicated as currently open.

Response: This issue as a whole is outside the scope of this SEPA checklist but is being looked into. We are aware of these concerns and intend to address the issue as part of the management of the entire Loomis State Forest. Thank you for your maps, they have been reviewed. Some of the areas in dispute were easily verified while others require additional research. The completion of this management plan will not end these types of issues, but will lay a foundation to aid in resolving these conflicts in the future. Working with users in the future will be important to either preventing or resolving these issues.

No Change recommended:

66. Summer ATV use must be kept in check as well. No one should be allowed access with ATVs without permission from NRCA and regional staff. [Skatrud]

Response: See changes recommended regarding comment #31.

67. On ATV use, I have concerns that there is not enough enforcement projected to keep ATV users from ignoring the set boundaries (were it up to just me there would be no ATVs anywhere ever for recreational use, but I could live with the current boundaries if I knew they wouldn't be violated.) That's both the summer and winter types of vehicles. [Belzer]

Response: The first step towards increasing the percentage of visitors who contribute to the goals and objectives of the NRCA is to work with user groups to develop and install new signs with a positive message that conveys what users are or are not permitted. A second management action is to work with user groups to develop site plans to serve permitted uses and discourage prohibited uses at access points. Both of these management actions are listed in the management plan.

No Change Recommended.

68. Would like to see the multiple use act apply. [Peterson]

Response:

Trust Lands: The Multiple Use Act applies to trust land. The act guides us to have multiple use opportunities that are compatible with trust management. This includes dispersed recreation, designated camping areas, trails and all the activities associated with public access to state lands.

NRCA Lands: Public use on the NRCA is managed according to the NRCA Act. NRCAs are managed to maintain ecological values and recreation is limited to low-impact uses. Within the Loomis NRCA we have additional uses that include snowmobile riding, horseback riding and livestock grazing as part of the memorandum of clarification.

No change recommended.

69. I don't believe in closing or gating roads because it restricts access to the public especially the elderly and disabled. [Peterson]

70. Closing roads and trails limits access for disabled ORV and snowmobile users. [Johnson]

71. The roads should be open for public use at all times. Fire season is an exception. Wood along side the roads can be used for firewood, it's dead already and is also a fire hazard. [Buhnel]

Response: Comments #69-#71.

Roads in the Loomis NRCA: As stated in the NRCA Statewide Management Plan, most existing roads in NRCAs will be closed and generally new roads will not be constructed because motorized use is usually not a low-impact activity and conflicts with the NRCA statute's conservation purpose. Thunder Mountain and Lone Frank roads will remain open to vehicular traffic depending on the availability of road maintenance funds. Motorized vehicles (except for snowmobiles) are prohibited in the north block thus Fourteen Mile Road and Disappointment Trail (originally a road built to transport fire fighting equipment) are gated. Exceptions for

wheeled motorized vehicles include agency use, resource protection, permit range management and written permission.

Roads in the Loomis State Forest: The Loomis Forest Landscape Management Plan addresses road closures and the total amount of roads that would be closed and left open in each decade of the plan. Some existing roads are closed for a variety of reasons including: minimizing maintenance costs from rutting during wet weather, trash dumping, timber theft, public safety issues, wildlife issues, and forest practice requirements. Other roads that were not usable in the past have been left open after timber harvest. Over the past three decades there has been an overall increase in public access in the Loomis State Forest. DNR makes every effort to maintain traditional access and uses.

No Change Recommended.

72. We need to use fire as a management tool. The negative effects of total fire elimination are becoming obvious. Trees are creeping out into meadows and out in the shrub steppe sagebrush land. Fire must be returned as a part of the mix. [Barnes]

Response: *The Loomis NRCA Management Plan does include recommendations to explore the possibility of using prescribed fire in shrub-steppe vegetation types.*

No Change Recommended.

73. Strong support of continued traditional agricultural practices and public access. [Kretz]

Response: *The Loomis NRCA Management Plan was developed to fulfill the parameters outlined in the First Memorandum of Clarification written for the Loomis NRCA. The first goal of the management plan came from the Memorandum of Clarification to ensure the continuation of traditional agricultural practices and recreational activities. The first goal is to coordinate conservation of natural ecological values with outdoor environmental education, low-impact public use, snowmobile use, equestrian activities and livestock grazing.*

No change recommended.

74. Needs by ranchers should take precedence over rules. [Plum]

Response: DNR is legally obligated to meet requirements outlined in the First Memorandum of clarification, the NRCA Act and HB1309 Ecosystem Standards. Ranchers who use state land are subject to the same requirements.

No change recommended.

75. Have there been any timber sales in the Loomis Forest in the last two years and how many? [Peterson]

Response:

This comment is outside the scope of the NRCA management plan. The information requested will be conveyed in a different forum and in context with the Loomis Forest

No Change Recommended.

Typos

- 76. Page 50 line 478. AUM (wildlife unit month or cow/calf pair) This should read AUM (animal unit month or cow/calf pair). [Windsor]
- 77. Page 57 line 673. The words "wildlife" should be changed to horse. [Windsor]
- 78. The word wildlife – it appears twice – in line 673 should be changed to read, horse or mule. [Nelson]

Response: Comments 75, 76, & 77. Thank you for noting those errors.

Changes recommended as suggested.

PLANNING PROCESS

- 79. The [Okanogan] Chapter [Backcountry Horseman Association] commends Andrew Stenbeck and Brooke Derr of the Washington Department of Natural Resources for their hard work on the plan and their willingness to meet on site with Chapter representatives to discuss continued use of the Loomis NRCA for recreational pack and saddle equestrian activity. [Nelson]
- 80. First, I would like to express my appreciation to you and your planning team for the opportunity we have had in participating with team members to express our views and concerns regarding the plan. All of your team members have been most professional during our meetings and ground reconnaissance trips. [Windsor]
- 81. FOLF and NWEA are very pleased with the public process associated with the NRCA Plan development. DNR personnel met with me numerous times, including a field trip to the north block. They also met with numerous other groups to get their thoughts, feelings, and comments. It has been a good experience, rare for most public processes. [Skatrud]
- 82. I'd like to say here how this NRCA process/DNR interaction has been surprisingly pleasant to date. [Belzer]
- 83. Well done on meetings I will review the new SEPA draft and submit comment in writing. [Kelly]
- 84. Refreshing change in meetings and public participation. [Barnes]

Response: Comments #80 thru #85. Thank you for acknowledging your positive experience with this planning process.

ENVIRONMENTAL CHECKLIST

- 85. In the environmental checklist on page 2 item 8 number 2 the Canadian Lynx is listed as the North American Lynx. It should be listed as the Canadian Lynx. [Windsor]

Response: Thank you for noting the error.

Additional Recommended Changes Based on Internal Comments:

Include fishing as a permitted use, managed and regulated by Washington Department of Fish and Wildlife.

Wheeled motorized vehicles condition of use to include exceptions for agency use, fire suppression, road maintenance and emergencies.

Under Sensitive Areas section in the Management Guidelines Chapter, mention that grazing is a permitted use and the permit range includes the sensitive areas mentioned in the plan.

Delete the duplicate paragraph in the Fire Suppression Plan, Section II.